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Via Electronic Filing & Federal Express

The Honorable Sharon A. King
U.S. District Court - District of New Jersey
Camden Vicinage
Mitchell H. Cohen & U.S. Courthouse
Court Room 3C
4th & Cooper Streets
Camden, NJ 08101

Re: *General Motors LLC, et al. v. Joseph Ashton,*
Case No. 1:20-cv-12659-RBK-SAK

Dear Magistrate Judge King:

Enclosed as **Exhibit 1** on behalf of Plaintiffs and Defendant (together, the “Parties”) is a proposed Discovery Confidentiality Order pursuant to Local Rule 5.3(b). The form of the proposed Discovery Confidentiality Order has been agreed between the Parties, and the Parties respectfully request that the Court enter it on the docket. For ease of reference, attached as **Exhibit 2** is a redline of the Parties’ proposed Discovery Confidentiality Order against the form “Discovery Confidentiality Order” included as Appendix S to the Local Rules.

Thank you for your consideration.

Sincerely,

/s/ James E. Marina

James E. Marina

cc: Rodman E. Honecker, Esq. (via ECF)